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June 2, 2022

VIA EMAIL

The Honorable Juan R. Sanchez, U.S.D.J.
Chief Judge, Eastern District of Pennsylvania
601 Market Street, No. 17614
Philadelphia, PA 19106

Re: Ingram v. County of Camden, et al.
District of New Jersey Docket No. 14-cv-5519
Our File No. 14-0712

Dear Chief Judge Sanchez:

Please accept this letter as an update regarding the completion of the proposed Settlement Agreement in this case.

Defendants respectfully request Your Honor's permission to have this matter referred to Magistrate Judge Carlos for a conference to address the remaining issues between the parties over the language of the Settlement Agreement.

As Your Honor will recall, this matter was settled on May 6, 2022. The parties have conferred as to the elements of the proposed Settlement Agreement. As the Court can appreciate, this process is complex for various reasons, including in particular the need to ensure that the Settlement Agreement complies with the Medicare Secondary Payer Act, see 42 U.S. Code § 1395y (to the extent applicable), and other legal requirements.

The parties are working to resolve certain issues, but the assistance of Judge Carlos will further facilitate this process.

Finally, please note that, given the circumstances and context in which the settlement proceeds are being paid – the settlement is fully-funded by Defendants' carriers – formal governmental approval of the settlement will not be an impediment to the completion of the settlement process.

For all of these reasons, we would respectfully request that the matter be referred for a conference with Judge Carlos.

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Respectfully submitted,

BROWN & CONNERY, LLP

/s/ William F. Cook

William F. Cook, Esquire

WFC/

cc: All Record Counsel (*via ECF*)
John Morgenstern, Esquire (*via email*)